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DEC 15 2022

KSC/12.12.22
AA: USAO#2022R00535

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

UNITED STATES OF AMERICA

v.

GABRIEL RUIZ,

Defendant.

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CRIMINAL NO.

(Possession with Intent to Distribute
Cocaine, 21 U.S.C. § 841; Importation
of Cocaine, 21 U.S.C. § 952; Forfeiture,
21 U.S.C. § 853)

LKG 22 cr 437

INDICTMENT

COUNT ONE

(Possession with Intent to Distribute Cocaine)

The Grand Jury for the District of Maryland charges that:

On or about June 20, 2022, in the District of Maryland, the defendant,

GABRIEL RUIZ,

did knowingly and intentionally possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)

21 U.S.C. § 841(b)(1)(A)

COUNT TWO
(Importation of Cocaine)

The Grand Jury for the District of Maryland further charges that:

On or about June 20, 2022, from the country of Dominican Republic, the defendant,

GABRIEL RUIZ,

did intentionally and knowingly import into the United States 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

21 U.S.C. § 952(a)

21 U.S.C. § 960(b)(1)(B)

FORFEITURE ALLEGATION

The United States Attorney for the District of Maryland further alleges that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the Defendant that, in the event of the Defendant's conviction, the United States will seek forfeiture as part of any sentence, in accordance with 21 U.S.C. § 853.

Narcotics Forfeiture

2. Pursuant to 21 U.S.C. § 853(a), upon conviction of an offense in violation of the Controlled Substances Act, as alleged in Counts One and Two, the Defendant shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and
- b. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

Substitute Assets

3. If, as a result of any act or omission by the Defendant, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the

forfeitable property described above, pursuant to 21 U.S.C. § 853(p).

21 U.S.C. § 853

Erek Barron / AA
Erek L. Barron
United States Attorney

A TRUE BILL.

SIGNATURE REDACTED

Foreperson

Date: 12/15/2022